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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TIFFANY HEDGEPEETH, an individual,

Plaintiff,

vs.

MEIBORG BROS, INC., an Illinois
Corporation; MEIBORG, INC., an Illinois
Corporation; JAMES RAY COX, an
individual; DOES I through X, inclusive;
ROE BUSINESS ENTITIES I through X,
inclusive,

Defendants.

CASE NO.: 2:24-cv-00045-CDS-MDC

**JOINT DISCOVERY PLAN AND
[PROPOSED] SCHEDULING
ORDER**

**[SUBMITTED IN COMPLIANCE
WITH LR 26-1(B)]**

The parties, by and through their counsel of record, hereby submit the following
Joint Discovery Plan and [Proposed] Scheduling Order pursuant to Rule 26(f)(3) and LR
26-1:

A. Answer. Defendants MEIBORG BROS., INC., MEIBORG, INC., and JAMES RAY
COX answered to Plaintiffs TIFFANY HEDGEPEETH complaint on December 28,
2023.

B. Meeting. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(a), a meeting was held on
February 2, 2024 at 3:00 p.m. was attended by:



1 Plaintiff's counsel: Angela M. Lee of PRINCE LAW GROUP, appearing on behalf
2 of Plaintiff TIFFANY HEDGEPEETH ("Plaintiff").

3 Defendant's counsel: Robert Thompson of RESNICK & LOUIS, P.C. appearing on
4 behalf of Defendants MEIBORG BROS., INC., MEIBORG, INC., and JAMES RAY COX
5 ("Defendants").

6 C. Initial Disclosures. Plaintiff produced her Initial Disclosures on **Thursday,**
7 **February 15, 2024.** Defendants produced their Initial Disclosures on **Friday,**
8 **February 16, 2024.**

9 D. Discovery Plan. Discovery does not need to be conducted in phases. The parties
10 jointly propose to the Court the following discovery plan:

11 1. Subject of Discovery. The parties agree that the areas of discovery should
12 include, but not be limited to: all claims and defenses allowed pursuant to the Federal
13 Rules of Civil Procedure.

14 2. Discovery Cut-Off Date(s). Discovery will take 180 days, measured from the
15 date the first defendant answers or appears, which means all discovery must be
16 completed by **Tuesday, June 25, 2024.**

17 3. Amending the Pleadings and Adding Parties. The last date for filing
18 motions to amend pleadings or to add parties shall not be later than 90 days prior to the
19 close of discovery. In this action, the last date to file motions to amend the pleadings or
20 add parties shall be **Wednesday, March 27, 2024.**

21 4. FRCP 26(a)(2) Disclosures (Experts). The last day to disclose expert
22 witnesses shall be 60 days before the discovery cut-off date. In this action, the last date
23 to disclose experts shall be **Friday, April 26, 2024.** The date for the disclosure of rebuttal
24 expert witnesses shall be 30 days after the initial disclosure of experts. In this action, the
25 last date to disclose rebuttal experts shall be **Monday, May 27, 2024 (actual due date**
26 **is Sunday, May 26, 2024).**

27 ...



1 5. Dispositive Motions. The last date to file dispositive motions shall not be
2 later than 30 days after the discovery cut-off date. In this action, the last date to file
3 dispositive motions shall be **Thursday, July 25, 2024**.

4 6. Joint Pretrial Order. The Joint Pretrial Order shall be filed no later than 30
5 days after the date set for filing dispositive motions. In this action, the joint pretrial order
6 shall be filed on or before **Monday, August 26, 2024 (actual due date is Saturday,**
7 **August 24, 2024)**. If dispositive motions are timely filed, the date for filing the Joint
8 Pretrial Order shall be suspended.

9 7. FRCP 26(a)(3) Disclosures. The disclosures required by FRCP 26(a)(3) and
10 any objections thereto shall be included in the Joint Pretrial Order.

11 8. Alternative-Dispute Resolution. The parties certify that they met and
12 conferred about the possibility of using alternative-dispute resolution processes including
13 mediation, arbitration, and if applicable, early neutral evaluation pursuant to LR 26-
14 1(b)(7).

15 9. Alternative Forms of Case Disposition. The parties certify that they
16 considered and did not consent to trial by magistrate judge under 28 U.S.C. § 636(c) and
17 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

18 10. Electronic Evidence. The parties certify that they discussed whether they
19 intend to present evidence in electronic format to jurors for the purposes of jury
20 deliberations. The parties will enter into stipulations before trial about providing
21 discovery in an electronic format compatible with the Court's electronic jury evidence
22 display system.

23 E. Consent to Service by Electronic Means through Electronic Mail. The undersigned,
24 on behalf of Plaintiff and Defendants, hereby consent to service of documents by
25 electronic means via electronic mail and/or facsimile and/or by U.S. Mail.

26 Documents served by electronic means must be transmitted to the following person
27 at the e-mail address and/or facsimile number below:
28



1. Plaintiffs' Attorneys: Prince Law Group

E-Service Address: dprince@thedplg.com, alee@thedplg.com,
eservice@thedplg.com

Facsimile Number: 702-534-7601

2. Defendant's Attorneys: Resnick & Louis, P.C.

E-Service Address: mroose@rlattorneys.com, rthompson@rlattorneys.com,
sjackson@rlattorneys.com, balexander@rlattorneys.com,
mmorrow@rlattorneys.com

Facsimile Number: 702-997-3800

DATED: March 5, 2024

DATED: March 5, 2024

PRINCE LAW GROUP

RESNICK & LOUIS, P.C.

/s/ Dennis M. Prince

/s/ Robert L. Thompson

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10801 W. Charleston Blvd., Suite 560

Attorneys for Defendants

Las Vegas, NV 89148

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

1. The discovery cut-off shall be **Tuesday, June 25, 2024.**

2. **Amending the Pleadings and Adding Parties.** The last date for filing motions to amend pleadings or to add parties shall not be later than 90 days prior to the close of discovery. In this action, the last date to file motions to amend the pleadings or add parties shall be **Wednesday, March 27, 2024.**

3. **FRCP 26(a)(2) Disclosures (Experts).** The last day to disclose expert witnesses shall be 60 days before the discovery cut-off date. In this action, the last date to disclose



experts shall be **Friday, April 26, 2024**. The date for the disclosure of rebuttal expert witnesses shall be 30 days after the initial disclosure of experts. In this action, the last date to disclose rebuttal experts shall be **Monday, May 27, 2024**.

4. **Dispositive Motions**. The last date to file dispositive motions shall not be later than 30 days after the discovery cut-off date. In this action, the last date to file dispositive motions shall be **Thursday, July 25, 2024**.

5. **Joint Pretrial Order**. The Joint Pretrial Order shall be filed no later than 30 days after the date set for filing dispositive motions. In this action, the joint pretrial order shall be filed on or before **Monday, August 26, 2024**.

6. **FRCP 26(a)(3) Disclosures**. The disclosures required by FRCP 26(a)(3) and any objections thereto shall be included in the Joint Pretrial Order.

DATED: 3-7-24



UNITED STATES MAGISTRATE JUDGE

RE: Hedgepeth v. Meiborg Bros, Inc., et. al.; Joint Status Report**Robert Thompson <rthompson@rlattorneys.com>**

Tue 3/5/2024 11:27 AM

To: Angela Lee <alee@thedplg.com>; Dennis Prince <dprince@thedplg.com>; Amy Larsen <alarsen@thedplg.com>; Jessica Mejia <jmejia@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Cc: Mark Smith <mrsmith@rlattorneys.com>; Bonita Alexander <balexander@rlattorneys.com>; Autumn Humble <ahumble@rlattorneys.com>

Hi Angela,

It was a pleasure speaking with you today. You may affix my signature to the updated discovery plan.

Please also allow this email to confirm that your office granted us an extension to respond to your written discovery requests (Interrogatories, Requests for Production and Requests for Admissions) to April 5, 2024.

We also grant you request of an extension to respond to our written discovery to Friday, March 22, 2024.

Thank you again for your professional courtesy. Please feel free to contact us any time if you have any questions.

Thanks,

Bobby

Robert L. Thompson, Esq.
8945 West Russell Road, Suite 330
Las Vegas, Nevada 89148
rthompson@rlattorneys.com
Telephone: (702) 997-1026



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From: Angela Lee <alee@thedplg.com>

Sent: Monday, February 26, 2024 3:51 PM

To: Robert Thompson <rthompson@rlattorneys.com>; Dennis Prince <dprince@thedplg.com>; Amy Larsen <alarsen@thedplg.com>; Jessica Mejia <jmejia@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Cc: Mark Smith <mrsmith@rlattorneys.com>; Bonita Alexander <balexander@rlattorneys.com>; Autumn Humble <ahumble@rlattorneys.com>

Subject: RE: Hedgepeth v. Meiborg Bros, Inc., et. al.; Joint Status Report

Hi Robert,